

## REMARKS

The following Remarks are in response to the Office action mailed Mar. 3, 2008. Claims 1-12 are pending in the application. Applicant appreciates Examiner's further careful review of the present application.

### ***Claim Rejections Under 35 U.S.C. 103***

Claims 1-12 were rejected under 35 U.S.C. 103(a) by being unpatentable over Chase, Jr. (U.S. 5,974,238, hereinafter referred to as "Chase") in view of Auto/Mate Dealership Systems website (accessed through archive.org with effective publication dates of 12/3/1998 (pg. 1) and 12/6/1998 (pg. 2), hereinafter referred to as Automate).

Applicant respectfully requests reconsideration and removal of the rejections and allowance of claims 1-12. The following remarks herein are responsive to the rejections as understood.

### **Claims 1-8**

Claim 1 recites in part:

"the application server comprises ***a Java Database Connectivity (JDBC) connection manager***, a cache manager and a replication manager, wherein:  
***the JDBC connection manager is used to preset a JDBC connection, and manage the JDBC connection with the database server;***

the cache manager is used to receive and store information sent by the mobile terminals and the database server; and

***the replication manager comprises a first data filter module, which is used to filter information added in the database server, and to modify existing information in the database server and the mobile terminals."***

Applicant submits that **Chase** and **Automate**, taken alone or in combination, do not teach or otherwise suggest the above-highlighted features, as currently set forth in claim 1.

**Chase** discloses an apparatus for performing dynamic synchronization between data stored

in a handheld computer and a host computer. The handheld computer has a processor, a communication port, and a data synchronization engine. The data synchronization engine has a pseudo-cache that exists on both the handheld computer and the host computer (col. 3, lines 37-45). In addition, the processor cache contains modified data and supplies the data to the other processor cache to maintain data coherency (col. 12, lines 34-37).

Applicant acknowledges that the pseudo-cache or the processor cache disclosed by Chase corresponds to the cache manager of claim 1 of the present application. However, the claimed feature of “a replication manager” is not taught or suggested by **Chase**. Furthermore, **Chase** fails to teach or suggest that “the replication manager comprises a first data filter module, which is used to filter information added in the database server, and to modify existing information in the database server and the mobile terminals”, as recited in claim 1. In particular, there is no teaching or suggestion in **Chase** regarding the feature of “a JDBC connection manager”, which is used to preset a JDBC connection and manage the JDBC connection with the database server, as recited in claim 1.

Accordingly, **Chase** fails to teach or suggest the feature whereby *“the JDBC connection manager is used to preset a JDBC connection, and manage the JDBC connection with the database server”*, and fails to teach or suggest the feature whereby *“the replication manager comprises a first data filter module, which is used to filter information added in the database server, and to modify existing information in the database server and the mobile terminals”*, as recited in claim 1.

As stated on pages 3-4 of the current Office action, **Automate** discloses an Auto/Mate Vehicle Merchandising & Inventory Control System to provide immediate access to all inventory data through the inquiry function, as well as providing customers with a computer calculated price quote (pg. 1 lines 1-3). **Automate** further discloses that online inquiry provides immediate access to all vehicle data by specific stock number. Thus, the entire inventory can be searched instantly for those vehicles that match the specified criteria (pg. 1, lines 11-12).

Applicant acknowledges that the feature of “searching vehicle orders daily information” is

disclosed or taught by **Automate**.

However, applicant asserts that the claimed features of “a JDBC connection manager” and “a replication manager” are not taught or suggested by **Automate**. Accordingly, **Automate** fails to teach or suggest the feature whereby *“the JDBC connection manager is used to preset a JDBC connection, and manage the JDBC connection with the database server”*, and fails to teach or suggest the feature whereby *“the replication manager comprises a first data filter module, which is used to filter information added in the database server, and to modify existing information in the database server and the mobile terminals”*, as recited in claim 1.

In addition, Examiner stated on page 6 of the current Office action that it would have been an obvious matter of design choice to a person of ordinary skill in the art to use Java database connection because applicant has not disclosed that using Java database connection provides an advantage, is used for a particular purpose, or solves a stated problem. Applicant respectfully disagrees and traverses as follows. The advantage of using the Java database connection is that it can extend and connect different background systems more easily. Furthermore, the Java application server can accept a new servlet without modification. Under the structure of the servlet, the system for querying reports only needs to download the new servlet once, when the system is used for the first time (see, e.g., par. [0027] of the present specification). Thus, it is not a matter of design choice for a person of ordinary skill in the art, or for anyone, to use Java database connection because Java database connection provides advantages in solving the stated problem(s) as recited above. Furthermore, such Java database connection is not taught in the asserted combination of **Chase** and **Automate**. Because neither **Chase** nor **Automate**, taken alone or in combination, disclose, teach, or otherwise suggest such a usage of Java database connection as taught in the present invention, and also because modifications to **Automate** would change **Chase**’s principle of operation in manner contrary to their stated purpose, the idea to modify must be drawn via impermissible hindsight from the present invention.

To a person of ordinary skill in the art there are no instances in either **Chase**’s system or in the **Automate**’s reference where it is obvious to use Java database connection as provided in the

present application. That is, the manner of using Java database connection claimed in claim 1 of the present invention is unobvious over **Chase** in view of **Automate**. Therefore, the idea to modify either/or or both **Automate** and **Chase** must be drawn via impermissible hindsight from the present application. For at least the above-described reasons, the rejection of claim 1 is improper and should be withdrawn. Applicant respectfully submits that claim 1 is unobvious and patentable under 35 U.S.C. §103 over **Chase** in view of **Automate**. Reconsideration and removal of the rejection and allowance of the claim are requested.

Claims 2-8 depend from claim 1, and respectively incorporate additional features therein. Accordingly, claims 2-8 are also unobvious and patentable over **Chase** in view of **Automate**.

### **Claims 9-11**

Claim 9 recites in part:

*”(c) connecting a database server with a Java Database Connectivity (JDBC) connection, managing the JDBC connection with the database server, and obtaining information needed to meet the synchronization request; and*

*(d) setting one or more search parameters, generating a search message, and sending the searching message to the mobile terminal, **the searching message comprising vehicle orders daily information and distributor orders daily information.”***

Claim 9 is a method claim that recites limitations similar and corresponding to those of claim 1. Referring to and incorporating herein the above-asserted reasons regarding the patentability of claim 1, applicant submits that **Automate** and **Chase**, taken alone or in combination, do not teach or suggest the present invention having the above-highlighted limitations as set forth in claim 9. Accordingly, claim 9 is unobvious and patentable under 35 U.S.C. §103 over **Chase** in view of **Automate**. Reconsideration and removal of the rejection and allowance of claim 9 are requested.

Claims 10 and 11 depend from claim 9, and respectively incorporate additional features therein. Accordingly, claims 10 and 11 are also unobvious and patentable over **Chase** in view

of **Automate**.

**Claims 12**

Claim 12 recites in part:

”the application server comprises *a Java Database Connectivity (JDBC) connection manager*, a cache manager and a replication manager, wherein:

*the JDBC connection manager is used to preset a JDBC connection, and manage the JDBC connection with the database server;*

the cache manager is used to receive and store information sent by the mobile terminals and the database server; and

*the replication manager comprises a first data filter module, which is used to filter information added in the database server, and to modify existing information in the database server and the mobile terminals.”*

For at least reasons similar and corresponding to those asserted above in relation to claim 1, applicant submits that **Automate** and **Chase**, taken alone or in combination, do not teach or otherwise suggest the invention having the above-highlighted features as currently set forth in claim 12. Neither reference provides any teaching, suggestion or motivation that it could be combined with the other to yield the inventive system as currently set forth in claim 12. That is, claim 12 is unobvious and patentable under 35 U.S.C. §103 over **Chase** in view of **Automate**. Applicant requests reconsideration and removal of the rejection and allowance of the claim.

In view of the above remarks, the subject application is believed to be in condition for allowance, and an action to such effect is earnestly solicited.

## CONCLUSION

Applicant submits that the foregoing Response place this application in condition for allowance. If Examiner believes that there are any issues that can be resolved by a telephone conference, or that there are any informalities that can be corrected by an Examiner's amendment, please call the undersigned at 714.626.1224.

Respectfully,

Lee et al.

By       / Frank R. Niranjan/       Date: April 17, 2008

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